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15	LIMITED CTATECI	DISTRICT COLUDT		
16	UNITED STATES DISTRICT COURT			
17	FOR THE NORTHERN DISTRICT OF CALIFORNIA			
18	(SAN FRANCISCO DIVISION)			
19	1			
20	IN RE: TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION	MASTER CASE NO. 3:07-md-1827 SI, MQ CASE NO. 10-cv-4945-SI, MQ		
21	This Document Relates To:	MDL NO. 1827		
22	Case No. 10-cv-4945 SI, MQ	STIPULATION AND [PKOPOSED]		
23	Target Corp., et al.,	ORDER PERMITTING DEPOSITION OF MANDY WANG BEYOND DISCOVERY		
24		CUTOFF DATE		
	Plaintiffs,			
25	V.			
26	AU Optronics Corporation, et al.,			
27	Defendants.			
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l l				

1 2 Plaintiff Newegg Inc. ("Plaintiff") and Defendants LG Display Co., Ltd. and LG Display 3 America, Inc. ("LG Display Defendants"), parties to the above-entitled action (collectively referred to 4 herein as the "Parties"), hereby stipulate as follows: 5 **STIPULATION** 6 7 WHEREAS, the Parties have met and conferred to discuss scheduling the deposition of 8 Plaintiff's employee, Mandy Wang, for several weeks now; 9 WHEREAS, Ms. Wang is not available for a deposition before the discovery cutoff date of 10 December 8, 2011; WHEREAS, Plaintiff has agreed to make Ms. Wang available for a deposition after the 11 12 discovery cutoff as set forth below, if the LG Display Defendants choose to notice her deposition; 13 NOW, THEREFORE, the Parties, through their undersigned respective counsel, stipulate and request that the Court order as follows: 14 15 1. That the discovery cutoff date of December 8, 2011, be extended for the sole purpose of the aforementioned, proposed deposition; and 16 2. 17 That the LG Display Defendants may take the deposition of Mandy Wang on or 18 between January 16, 2012 and January 31, 2012, or, if Ms. Wang remains unavailable during that 19 period, on a date or dates to be determined by mutual agreement between the Parties. 20 21 DATED: November 28, 2011 22 23 By: s/ Michael R. Lazerwitz Michael R. Lazerwitz (PRO HAC VICE) 24 Jeremy J. Calsyn (State Bar No. 205062) Lee F. Berger (State Bar No. 222756) 25 CLEARY GOTTLIEB STEEN & HAMILTON LLP One Liberty Plaza 26 New York, NY 10006 (212) 225-2000 (Phone) 27 (212) 225-3999 (Facsimile) mlazerwitz@cgsh.com 28

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10	Attestation. The filer of this document attests that concurrence in the filing of this document has		
11	Attestation: The filer of this document attests that concurrence in the filing of this document has		
12	been obtained from each of the other signatories.		
13			
14	By: <u>/s/ Michael R. Lazerwitz</u> Michael R. Lazerwitz		
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1	[PROPOSED] ORDER	
2		Under the parties' stipulation set forth above, IT IS SO ORDERED.
3		11/20/11
4	Dated	11/29/11 Hon. Susan Illston
5		United States District Judge
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